

4. Creditor objects to confirmation of the Plan because the Plan understates the correct monthly payment; per the plan it is \$621.10, but per Creditor it is \$714.60.

5. Furthermore, the Plan incorrectly states there is only \$16,881.70 due in arrearages when, in fact, Creditor is entitled to full payment of its secured pre-petition arrearage claim and its secured post-petition arrearages pursuant to the Note and Deed of Trust which will approximately amount to the \$105,784.87.

6. Because the regular monthly payment and the total arrears listed for Creditor are understated, the Chapter 13 plan may not be feasible.

7. Because Creditor was forced to file this Objection to Confirmation to protect its secured interest in the subject real property, it has incurred reasonable attorneys' fees.

WHEREFORE, PREMISES CONSIDERED, Creditor prays this Court deny confirmation of the Plan proposed by the Debtor, and attorneys' fees and costs, and grant Creditor such other and further relief, at law and in equity, as is just.

Respectfully submitted,

MACKIE WOLF ZIENTZ & MANN, P.C.

/s/ Winston Davis

Winston Davis, Bar No. 35104

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ATTORNEY FOR CREDITOR

CERTIFICATE OF SERVICE

I, Winston Davis, do hereby certify on July 5, 2018 a copy of the motion was served on the persons listed below in the manner indicated.

/s/ Winston Davis
Winston Davis

Via U.S. Mail:
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